

Exhibit G

Excerpted

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
NO. 10-cv-6950-AT-RWL

X-----X
H. CHRISTINA CHEN-OSTER, : CIVIL ACTION
SHANNA ORLICH; ALLISON : DEPOSITION OF:
GAMBA; and MARY DE LUIS, :
:
Plaintiffs, :
EDITH A. HUNT
vs. :
:
GOLDMAN, SACHS & CO. and :
THE GOLDMAN SACHS GROUP, :
INC., :
Defendants. :
X-----X

C O M P U T E R I Z E D T R A N S C R I P T
of the stenographic notes of the proceedings in
the above-entitled matter as taken by and before
MELISSA J. LUMI, a Certified Court Reporter, No.
30X100237000, and Notary Public of the State of
New Jersey, taken remotely, on September 30, 2020
commencing at 10:15 in the forenoon.

Job no. 4273283
Pages 1 - 221

1 A P P E A R A N C E S:

2
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10 Attorneys for the Defendants.

11
12 ALSO PRESENT:

Jim Roberts - Videotape Specialist

13 Gena Palumbo, Esq. - Goldman Sachs

1 process, based on recommendations that come up
2 and get reviewed by a committee, were the topic
3 of many career development panels that were held
4 by divisions across the firm to help demystify
5 the process so that people could understand how
6 the processes worked and therefore lend an heir
7 of credibility to them, but those were not
8 conversations that I was personally involved in.

9 Q. I'm asking specifically about the
10 human capital management review with respect to
11 gender. Was that something that was made known
12 to employees?

13 MS. DAVIDOFF: Objection to form.

14 A. I do not know.

15 Q. We've discussed a little bit
16 conversations you've had with Lloyd Blankfein
17 regarding People survey. More broadly speaking,
18 though, how involved was Mr. Blankfein with
19 respect to diversity efforts at Goldman Sachs?

20 MS. DAVIDOFF: Objection to form.

21 Vague.

22 A. And also I did not -- one of your
23 words, how involved was Lloyd Blankfein in
24 diversity what to the form?

25 Q. Efforts.

1 A. I would say Lloyd was very
2 involved with diversity efforts. I would
3 describe him as a champion.

4 (Court reporter clarification.)

5 A. A champion.

6 Q. And what would that description be
7 based on?

8 A. The pattern of communication from
9 the executive office, the number of times Lloyd
10 would appear in front of different diverse groups
11 as part of, you know, affinity network meetings,
12 he helped us launch the firm wide network, the
13 firm wide women's network, he helped launch the
14 women's network within fixed income currencies
15 and commodities, and a general egalitarian
16 fairness-minded individual. As someone who came
17 from an underprivileged background himself, he
18 really embraced all concepts for diversity.

19 Q. Did you and Mr. Blankfein ever
20 discuss how women performed compared to men in
21 the 360 review?

22 A. We did not.

23 Q. Do you know whether Mr. Kennedy
24 ever had that conversation with Mr. Blankfein?

25 A. I do not.

1 being presented.

2 I don't recall that I specifically
3 had a personal conversation with Lloyd about it,
4 but I think the cross-ruffing process is one
5 where we really took extra steps to ensure that
6 there was gender equality involved in the process
7 and I'm sure that he would have been very much
8 aware of that and very much interested in
9 results.

10 Q. Did you ever have conversations
11 with Mr. Blankfein about a gender pay gap at
12 Goldman Sachs?

13 MS. DAVIDOFF: Objection.
14 Foundation.

15 A. I did not.

16 Q. Do you know if Mr. Kennedy had a
17 conversation with Mr. Blankfein about a gender
18 pay gap at Goldman Sachs?

19 MS. DAVIDOFF: Objection to form.

20 A. I do not.

21 Q. Are you aware of any
22 recommendations made to Mr. Blankfein about
23 diversity that he did not support?

24 A. Not that I recall.

25 Q. How involved was David Solomon

1 with diversity efforts at Goldman Sachs?

2 A. During the era when I was
3 responsible for all of the human resources
4 activities of the fixed income currencies and
5 commodities division, David was very actively
6 involved in the initiatives.

7 Q. Was Mr. Solomon involved on
8 diversity issues while you were head of GLD?

9 A. I don't exactly have a tracking of
10 David Solomon's career in my mind, but at one
11 point he became co-head or head of IBD, the
12 investment banking division. The fact that there
13 was the presentation on diversity to the
14 investors banking division operating committee,
15 generally those things happened because they're
16 requested by someone. So I would surmise that
17 that was something that was produced at David's
18 request.

19 David was very involved in the
20 recruiting activities for the firm and he was
21 actually the head of the firm wide recruiting
22 committee.

23 Q. Did you ever meet directly with
24 Mr. Solomon regarding diversity issues?

25 A. I would have met with David

1 Solomon during the divisional business plan
2 review for the investment banking division, if,
3 in fact, he were a division head at that time.

4 Q. Other than through the business
5 plan review, do you recall meeting with Mr.
6 Solomon regarding diversity issues?

7 A. I don't specifically recall.

8 Q. Do you know whether Mr. Kennedy
9 met with him regarding diversity issues?

10 A. I don't know.

11 Q. Did you ever have a conversation
12 with Mr. Solomon about how women performed
13 compared to men in the 360 review?

14 A. No.

15 Q. What about the manager quartile?

16 A. No.

17 Q. What about a gender pay gap at
18 Goldman Sachs?

19 A. No.

20 Q. Do you know whether Mr. Kennedy
21 had conversations with Mr. Solomon on any of
22 these issues?

23 A. I do not.

24 Q. Are there any recommendations that
25 GLD made that Mr. Solomon did not support?

1 A. Not that I am aware.

2 Q. How involved was Gary Cohn with
3 diversity efforts at Goldman Sachs?

4 A. I'm sorry. I didn't hear the
5 beginning of that question.

6 Q. How involved was Gary Cohn with
7 diversity efforts at Goldman Sachs?

8 A. I would say that Gary was also a
9 champion.

10 Q. How often did you meet with Mr.
11 Cohn regarding diversity issues?

12 A. Specifically one-on-one with him
13 for diversity issues, I don't recall, but it was
14 not often.

15 David was a big proponent of the
16 firm wide black network, and he met very often
17 with leaders of that affinity group and members
18 of that affinity group.

19 Q. So you mentioned David just now,
20 but to be clear, I'm asking about Gary Cohn. Is
21 your answer the same?

22 A. Which answer are you referring to?

23 Q. How often did you meet with Mr.
24 Cohn regarding diversity issues?

25 A. Infrequently, if ever.

1 the U.S.

2 Q. Do you know who Jay Michael Evans
3 is?

4 A. Yes.

5 Q. Do you recall Mr. Evans role with
6 respect to diversity efforts at Goldman Sachs?

7 A. You know, I seem to recall him as
8 fairly proactive, but I could not identify
9 specific things that he did like I was able to do
10 for some of the other people we've discussed, but
11 Mike was generally highly attune to human capital
12 issues.

13 Q. We've discussed Mr. Paulson. Do
14 you recall who that is?

15 A. I'm sorry. I didn't hear the
16 name.

17 Q. Hank Paulson.

18 A. Oh, Hank Paulson. Yes. I know
19 him.

20 Q. Would you say that Mr. Paulson was
21 actively involved in diversity efforts at Goldman
22 Sachs?

23 A. Yes.

24 Q. Did he receive reports from you
25 about diversity efforts at Goldman Sachs?

1 diversity at Goldman Sachs. Do you recall that?

2 A. I do.

3 Q. Did Mr. Cohn have a unique role
4 within the firm in terms of monitoring or
5 advancing diversity efforts?

6 MS. DAVIDOFF: Objection to form.

7 A. One, he was president of the firm,
8 so I think by definition he had a particular role
9 in advancing diversity issues at the firm. I
10 know for a time he was the management committee
11 sponsor for the firm wide black network, so I
12 know he had a specific role there. He might have
13 had other roles as well that I don't recall at
14 the time.

15 I do recall a time early in fixed
16 income when I was still there and he was one of
17 the heads of fixed income division, we would have
18 summer interns come to the firm and we always had
19 a substantial portion of black and Latino interns
20 as part of building our pipeline and we would
21 have an general orientation and we would have a
22 specific orientation with our underrepresented
23 minorities and Gary would come and I remember one
24 time he said, I am here this summer, I am in town
25 all week, my family is out in the Hamptons, that

1 means four nights a week I am available for
2 dinner, so please, get yourselves together in
3 small groups and get on my calendar because I
4 want to have dinner with you.

5 Now, for a very senior management
6 committee person at that point in time to extend
7 that general open invitation to a group of
8 analysts and associates who are summer interns I
9 think speaks to the kind of commitment that he
10 was sharing way in advance of the 2001 diversity
11 task force.

12 Q. You also testified that Mr.
13 Blankfein was a champion of diversity at Goldman
14 Sachs. Do you recall that?

15 A. I do.

16 Q. Did Mr. Blankfein have a unique
17 role within the firm in terms of monitoring or
18 advancing diversity efforts?

19 MS. DAVIDOFF: Objection to form.

20 A. Well, he did lead the 2001
21 diversity task force, and therefore, as he
22 continued to take on more and more senior
23 leadership roles in the firm, he personally
24 embraced them, and he was the one who developed
25 the idea for a 2006 diversity task force shortly

C E R T I F I C A T E

I, MELISSA LUMI, a Certified Court Reporter and Notary Public of the State of New Jersey certify that the foregoing is a true and accurate Computerized Transcript of the Deposition of Edith Hunt, who was first duly sworn by me.

I further certify that I am neither attorney, of counsel for, nor related to or employed by any of the parties to the action in which the Depositions are taken, and further that I am not a relative or employee of any attorney or counsel employed in this case, nor am I financially interested in the action.

Dated: October 1, 2020

A handwritten signature in black ink, appearing to read 'M. Lumi', is written over the printed name.

MELISSA LUMI, C.C.R.